

EXHIBIT L

FW: Deposition

From: R. J. Shannon <rshannon@shannonleellp.com>

Thu, May 16, 2024 at 9:37 AM CDT (GMT-05:00)

To: Steve Sather <ssather@bn-lawyers.com>; reese.baker@bakerassociates.net <Reese.Baker@bakerassociates.net>; Ali @ Jetall <ali@jetallcapital.com>

The Trustee is available on June 6, 7, 10, or 14. When would (a) Choudhri, (b) a representative for the Debtor, and (c) a representative for 2425 WL be available from June 6-14?

Also, FYI, below is the email to Steve this morning and attached is the draft 2004 Notice for 2425 WL. We'll get ones for Choudhri and the Debtor but figure it makes sense to get dates first.

R. J. Shannon

Partner

Shannon & Lee LLP

Cell: (512) 693-9294

From: R. J. Shannon <rshannon@shannonleellp.com>

Date: Thursday, May 16, 2024 at 7:59 AM

To: Steve Sather <ssather@bn-lawyers.com>

Subject: Re: Deposition

If you want 26 requests with many of them having multiple parts, we are not going to be able to reduce the time that would otherwise be required. Why don't you try to pare that back? It's not clear how some of that stuff is relevant to confirmation anyway.

To speed things up either way, any issue with a protective order (a) confirming no waiver of privilege and (b) saying that you would keep the documents confidential other than with respect to hearings before the Court? I think we would need that anyway. You are asking for documents about ongoing negotiations.

We are still putting together the list for Choudhri personally, but attached is a draft for 2425 WL. Please let us know the availability for that. We're asking for fewer documents, so similar timing shouldn't be a problem.

R. J. Shannon

Partner

Shannon & Lee LLP

Cell: (512) 693-9294

From: Steve Sather <ssather@bn-lawyers.com>

Date: Thursday, May 16, 2024 at 7:15 AM

To: R. J. Shannon <rshannon@shannonleellp.com>

Subject: Re: Deposition

From: R. J. Shannon <rshannon@shannonleellp.com>

Sent: Wednesday, May 15, 2024 6:07 PM

To: Steve Sather <ssather@bn-lawyers.com>

Cc: Reese Baker <Reese.Baker@bakerassociates.net>; Ali @ Jetall <ali@jetallcapital.com>

Subject: Re: Deposition

I have forwarded to Chris and will respond. I know we've been discussing deposing Choudhri / 30(b)(6) of the Debtor & Jetall anyway so could do them together.

As for the documents, I think it would depend on what you are requesting and how much time it would take to gather them. Can you provide the requests?

R. J. Shannon
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512-693-9294

From: Steve Sather <ssather@bn-lawyers.com>
Sent: Wednesday, May 15, 2024 5:53:50 PM
To: R. J. Shannon <rshannon@shannonleellp.com>
Cc: Reese Baker <Reese.Baker@bakerassociates.net>; Ali @ Jetall <ali@jetallcapital.com>
Subject: Deposition

The Debtor, 2425 WL and Ali Choudhri would like to depose the trustee in connection with the plan. Could you please provide us several dates in June to choose from. I will not be taking the deposition myself so it can take place while I am on vacation. We will also want to shorten the time to produce documents to 14 days. Please let me know if you will agree to this without a motion. Thank you.

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Attachments

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